

From: a.stamer@naturland.de
Sent: Friday, October 06, 2006 11:59 AM
To: Frances, Valerie
Subject: Comments to questions raised by NOSB Livestock Committee regarding organic aquaculture production

Attachments: ATTACHMENT.TXT

Dear Mrs. Francis,

I joined the discussion regarding the use of fish meal and-oil two days ago and George Lockwood asked me to send my short e-mail also to the NOSB Lifestock Committee. As today is the deadline for comments I would be happy if my opinion would be registered, too. Much was commented in the last days, so I do have the luck being able to make it short. As follows you find what I sent to noawg yesterday.

Thanks and best regards,

Andreas



Von: Andreas Stamer
Gesendet: Donnerstag, 5. Oktober 2006 11:23
An: 'Brad Hicks'; National Organic Aquaculture Work Group
Betreff: AW: [noawg] FW: noawg

Dear Friends and Colleagues,

Regarding the discussion on the fishmeal-content in salmonid-species' diets we should keep in mind that a content of more than about 10% soybean-meal causes severe tissue damages in salmon, for example. The restriction to 12% fishmeal/oil will lead to much higher soybean-levels in the feed. Salmonids and other piscivore fish are no vegetarians and the nutritional requirements of these species will lead to heavy use of free amino-acids (histidine and others)if we would follow the NOSB proposal. This is not acceptable for the organic community.
NOSB should stress the need for using sustainable fishmeal-sources instead of that.

Best regards,

Andreas



-----Ursprüngliche Nachricht-----

Von: Brad Hicks [mailto:bhicks@firstmate.com]

Gesendet: Donnerstag, 5. Oktober 2006 07:16

An: National Organic Aquaculture Work Group

Betreff: RE: [noawg] FW: noawg

Hello All

Fish (protein - fish meal and oil - fish oil) is the natural diet of many piscivorous animals including salmon and many other marine species. Yet it appears that the NOSB wants salmon and other marine species to eat something else - either vegetable or terrestrial animal by-products. How can this be? Why would organic production not allow the natural ingredients to be used the diet?

The production of fish meal and fish oil is akin to the production of hay or silage. It is simply a way to cure products so they can be used from storage and to facilitate transportation.

It appears to me that the anti-aquaculture set has somehow convinced the NOSB that somehow fishmeal and fish oil should not be used in the production of fish. This makes absolutely no sense to me. The use of fishmeal and fish oil to produce fish is a much better use of these materials than using them to produce poultry and swine or worse yet using them as fertilizer (allowed in many organic standards). By using fishmeal and fish oil to produce fish we are conserving the biological capital captured in these products in the most efficient and ecologically sound way.

Restricting the inclusion of fishmeal and fish oil to 12% of the diet is without any foundation and appears to be purely arbitrary.

Most Respectfully

Brad Hicks

-----Original Message-----

From: richard nelson [mailto:ecotruchas@hotmail.com]

Sent: October 4, 2006 5:52 PM

To: National Organic Aquaculture Work Group

Subject: [noawg] FW: noawg

>From: GSLockCVCA@aol.com

>To: gjensen@csrees.usda.gov, fjensen1@cox.net, ecotruchas@hotmail.com

>Subject: noawg

>Date: Wed, 4 Oct 2006 16:56:06 EDT

>

>Gary and Richard,

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> NOSB is requesting public comments concerning their recent

>questions about organic aquaculture with a deadline this Friday,

>October 6. AWG has responded and you can find the Aquaculture Working

>Group's response by navigating the following:

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>_http://www.ams.usda.gov/nop/_ (http://www.ams.usda.gov/nop/)

>

>Click on "national organic standards board"

>Then on "NOSB meetings"

>Then "Public Comments Received Regarding the October 2006 NOSB Meeting"

>

>Finally on "Livestock Committee"

>

>There are two postings that pertain to aquaculture:

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> _Aquaculture Working Group: Aquaculture Questions_

>(http://www.ams.usda.gov/nosb/PublicComments/Oct06/LCAquaticAnimalsTask

>ForceResponsetoInvitation.pdf

>)

>_Sustainable Fishery Advocates: Aquaculture Questions_

>(http://www.ams.usda.gov/nosb/PublicComments/Oct06/LCSustainableFishery

>AdvocatesAquaculture.pdf)

>

>

> I encourage interested parties from the aquaculture community,

>including from NOAWG to submit responses as soon as possible.

>

> George

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>George S. Lockwood

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